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9 Attorneys for Plaintiff Forest Ambulatory
 Surgical Associates, L.P. doing business as Forest
 10 Surgery Center



8/2/2011

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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14
 15 FOREST AMBULATORY SURGICAL
 ASSOCIATES, L.P., doing business as
 16 FOREST SURGERY CENTER,

17 Plaintiff,
 18 vs.

19 UNITED HEALTHCARE INSURANCE
 COMPANY and DOES 1 through 20,

20 Defendants.

21 CASE NO. CV10-04911 EJD
 (Case Assigned for All Purpose to Hon.
 Edward J. Davila)

22
JOINT STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO FILE
SECOND AMENDED COMPLAINT

23 (Santa Clara Superior Court Number:
 110CV183843)

24 Complaint Filed: Sept. 29, 2010

25 Plaintiff, FOREST AMBULATORY SURGICAL ASSOCIATES ("Forest") and
 26 Defendant, UNITED HEALTHCARE INSURANCE COMPANY ("United"), hereby agree to
 extend the deadline to file the Second Amended Complaint based on the following reasons:

27 (1) Forest has requested from United, but not yet received, all of the ERISA
 28 plan documents and summary plan descriptions for the claims at issue in
 this case. The parties anticipate that three additional weeks will provide

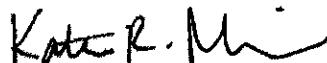
1 sufficient time for United to provide the plan documents and for Forest to
2 review and incorporate relevant plan terms as appropriate in its amended
3 pleading.

4 (2) Forest has recently become aware of additional unpaid and/or underpaid
5 claims that may be appropriate to add to this lawsuit. Being granted three
6 weeks of additional time to evaluate the potential new claims would enable
7 Forest to file a more complete Second Amended Complaint.

8 **IT IS SO STIPULATED.**

9
10 DATED: July 29, 2011

HOOPER, LUNDY & BOOKMAN, P.C.

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12 By: 
13 KATHERINE R. MILLER
14 Attorneys for Plaintiff Forest Ambulatory Surgical
Associates, L.P. doing business as Forest Surgery
Center

15 DATED: July 29, 2011

WALRAVEN & LEHMAN LLP

16
17 By: 
18 BRYAN S. WESTERFELD
19 Attorneys for Defendant United Healthcare Insurance
20 Company

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1 ~~PROPOSED~~ ORDER
2

3 IT IS HEREBY ORDERED that, good cause having been shown, Forest Ambulatory
4 Surgical Center's deadline to file its Second Amended Complaint is extended from August 12,
5 2011 to September 2, 2011.

6 **IT IS SO ORDERED.**

7 DATED: August 2, 2011

8 By: 
9 Honorable Edward J. Davila
10 United States District Court Judge